

Thank you for allowing me to comment on the ARRL petition RM-10413.

I do not concur with the ARRL proposal to expand the phone allocation by eliminating the present Novice and Technician subbands. I believe that it would not be in the best interests of Amateur Radio. I do agree that the original purpose of these subbands is no longer needed due to the change in code requirements and those brought about by the recent license restructuring. With these changes, there seems to be little reason why Novice and Tech Plus licensees should not be permitted to operate in the CW portions of the General 80,40,15, and 10 meter bands with a limit of 200 Watts. I believe however, that there are several compelling reasons why the present CW allocation in these bands should be retained. Decreasing the allocation will have a negative effect on the use of CW and imply that it's usefulness has been outlived. This is not the case.

I have felt for many years that the argument depicting CW as an obsolete and antiquated form of communications that has little if any value, is seriously flawed. Those who foster this theory do not fully understand the role that CW plays in Amateur Radio. They have based their misguided opinion on a comparison between Amateur Radio and Military and Commercial communication systems. Amateur Radio is a completely unique operation in itself. It can not be equated to other communication systems that have abandoned CW in recent years. The implication that Amateur Radio should do the same, does not take into account that these systems no longer use CW because they require communication modes that can deliver high rates of data transfer. There is little if any need for that in Amateur Radio.

Military and Commercial operations use high power and large, highly efficient antenna systems to insure reliable communications. Amateur Radio does not have that luxury. It is now, always has been and will always be a weak signal type of operation. That is the reason why CW has been used since it's inception. In many cases, it is the only mode of communications that can be used under marginal conditions and be depended on to get the message through.

Moreover, the trend in residential housing toward Condominium living, along with restrictive covenants in other types of housing, prohibit the use of outside Antenna installations. This necessitates the use of low power to minimize interference to Consumer Electronics, and small inefficient antennas that can be hidden or disguised. In these cases, CW may be the only HF mode that is usable. This may be the reason why CW operation has been increasing for the last several years and makes the case for retaining the CW allocation even stronger. I suggest that instead of expanding the Phone bands, the present Novice subbands be completely or at least in part reallocated for use by low power CW stations. The maximum power level can be determined by the Commission after a study has been completed. I'm sure this change would be welcomed. It would enable

those who must operate under less than ideal conditions, the ability to complete their contacts without heavy interference from higher power stations.